



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AAS/RMP  
F. #2021R00600

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 17, 2024

Kenneth Abell  
Jarrod L. Schaeffer  
Abell Eskew Landau LLP  
256 Fifth Avenue, 5th Floor  
New York, NY 10001

Seth DuCharme  
Nicole Boeckmann  
Bracewell LLP  
31 W. 52nd Street, Suite 1900  
New York, NY, 10019-6118

By Email and ECF

Re: United States v. Sun, et. al.  
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

Pursuant to its obligations under Brady v. Maryland, 373 U.S. 83 (1963) and its progeny, and out of an abundance of caution, the government discloses the following information. The following individuals may have information that is helpful to the defense: Kelly Brady; Larissa Rakoczy; and Hong Guiying, also known as Sandy Hong.

Copies of reports of their statements, Bates-numbered with the ranges indicated below. This letter will be accompanied by a link, sent by separate e-mail, to the secure download of the reports.

<b>Name</b>	<b>Bates No.</b>
Kelly Brady	EDNY_046256-EDNY_046264
Larissa Rakoczy	EDNY_046265-EDNY_046319
Hong Guiying, also known as Sandy Hong	EDNY_046320-EDNY_046321

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Alexander A. Solomon  
Alexander A. Solomon  
Robert M. Pollack  
Assistant U.S. Attorneys  
(718) 254-7000

cc: Clerk of the Court (BMC) (by ECF)